

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-JPS

**NOTICE OF THIRD & FINAL APPLICATION FOR CHAPTER 11 COMPENSATION OF THE
ATTORNEYS REPRESENTING THE COMMITTEE OF UNSECURED CREDITORS,
DEADLINE TO OBJECT, AND FOR HEARING**

PLEASE TAKE NOTICE that a *Third & Final Application for Chapter 11 Compensation of the Attorneys Representing the Committee of Unsecured Creditors* (the "Application") has been filed in the above case. Pursuant to the Application, the Court is requested to allow and award compensation to Jones & Walden LLC, as follows:

- (1) \$125,642.50 representing fees;
- (2) \$8,422.91 representing actual out-of-pocket expenses incurred on behalf of the Committee of Unsecured Creditors; and
- (3) that the Debtor be authorized and directed to pay the Law Firm the \$134,065.41 requested award on a final basis and that any previous award be made final.

YOUR RIGHTS MAY BE AFFECTED. You should read these documents carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one. If not served with this notice in accordance with the Bankruptcy Code or the Federal Rules of Bankruptcy Procedure, a copy of the motion may be obtained upon written request to counsel for the Movant (identified below) or at the Clerk's office.

If you do not want the court to grant the relief sought in the Application or if you want the court to consider your views on the Application, then you or your attorney shall file with the court a written objection or response on or before **May 24, 2023**, pursuant to Fed.R.Bankr.P. 9006(f). If you are receiving this notice by mail, you may add three (3) days to the response date stated above. The objection or response should be sent to: Clerk, U.S. Bankruptcy Court, Middle District of Georgia, P.O. Box 1957, Macon, GA 31202, (478) 752-3506.

If an objection or response is filed, a hearing on the Application shall be held on **June 21, 2023, at 11:00 a.m. at the U.S. Bankruptcy Court, Macon Courthouse, Courtroom A, 433 Cherry Street, Macon, Georgia 31201.** Parties should consult the Court's website (www.gamb.uscourts.gov) concerning whether the hearing will be in-person, telephonic, or virtual. Please refer to Administrative Order #145 for more guidance. If you mail your response or objection to the Court for filing, you shall send it early enough so that the court will receive the objection or response on or before the date stated above. Any response or objection shall also be served on the Movant.

If you or your attorney does not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting relief.

This notice is sent by the undersigned pursuant to LBR 2016(c)(2).

This 3rd day of May, 2023.

JONES & WALDEN LLC

/s/ Thomas T. McClendon

Thomas T. McClendon

Georgia Bar No. 431452

Attorneys for Committee of Unsecured Creditors

699 Piedmont Avenue, NE

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IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-JPS

**THIRD & FINAL APPLICATION FOR CHAPTER 11 COMPENSATION OF
THE ATTORNEYS REPRESENTING THE COMMITTEE OF UNSECURED CREDITORS**

TO: THE HONORABLE JAMES P. SMITH
CHIEF JUDGE, U.S. BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

COMES NOW Jones & Walden LLC (the "Law Firm"), the attorneys for the Committee of Unsecured Creditors, and files this, its *Third & Final Application for Chapter 11 Compensation of the Attorneys Representing the Committee of Unsecured Creditors* (the "Application"), and in support thereof respectfully shows as follows:

1. On or about January 27, 2022, (the "Petition Date"), Teri G. Galardi (the "Debtor") filed a petition for relief under Chapter 11 of Title 11, United States Code, 11 U.S.C. §§ 101 et seq.
2. On April 28, 2022, the United States Trustee filed a *Notice of Appointment of Committee of Unsecured Creditors* (Doc. No. 99) appointing the Committee of Unsecured Creditors (the "Committee") to serve on behalf of all general unsecured creditors in this case.
3. On May 2, 2022, the Committee filed an application to employ the Law Firm as its counsel in this bankruptcy case (Doc. No. 100). The Court entered the *Order Approving Employment of Attorney* (Doc. No. 103) granting such application on May 10, 2022.
4. The Law Firm shows that it has represented the Committee in this case since April 28, 2022.
5. The Law Firm makes its Application for the allowance of compensation for professional services rendered to the Committee for the period of time from October 12, 2022, through April 27, 2023 ("Application Period"), pursuant to 11 U.S.C. §§ 330 and 331. All services for which compensation is

requested were performed on behalf of the Committee and not on behalf of any other party, creditor, persons or party in interest.

6. The Law Firm has had numerous conferences with the Committee, the attorneys for the Debtor, and with the attorney for the U.S. Trustee regarding the Debtor and Debtor's assets with reference to this case. The Law Firm has conducted a financial investigation and has performed many other services necessary and proper to the administration of this estate.

7. The time expended by the Law Firm and the work performed by the Law Firm, for the period for which this Application is made, is duly itemized and set forth in Exhibit "A" which is attached hereto and incorporated herein by this reference.

8. The out-of-pocket expenses incurred by the Law Firm during the period for which this Application is made are duly itemized and set forth in Exhibit "A" which is attached hereto and incorporated by this reference. The copy costs reflected on Exhibit "A" are charged at the rate of \$0.10 per page. The facsimile costs are charged at the rate of \$1.00 per outgoing page.

9. The Law Firm has heretofore applied for interim compensation. The Law Firm was previously granted fees in the amount of \$31,691.00 and out-of-pocket expenses in the amount of \$761.10 by Order dated July 28, 2022 (Doc. No. 149) and fees in the amount of \$87,842.50 and out-of-pocket expenses in the amount of \$1,594.68 by Order dated November 21, 2022 (Doc. No. 250) for services rendered in connection with this case.

10. No agreement or understanding exists between the Law Firm and any other person for the sharing of compensation received or to be received for services rendered in connection with this case.

11. The Law Firm shows that it has expended a total of 385.82 hours in law firm time for the Application Period, in the total amount of \$125,642.50. The Law Firm shows that it has incurred a total of \$8,422.91 in out-of-pocket expenses and advances in the course of such representation and has thereby earned a total of \$134,065.41 pursuant to the above-referenced and heretofore disclosed compensation agreement. The Law Firm respectfully requests this Court to allow such sums as Chapter 11 compensation and an administrative expense of Debtor's estate. The Law Firm requests that the Court

award the Law Firm said amount and authorize the Debtor to pay the Law Firm \$134,065.41 on a final basis, which amount represents the requested fees and expenses.

12. The Law Firm seeks permission for the Chapter 11 Debtor to pay the amounts requested pursuant to this Application from the Debtor's funds. The Law Firm requests that the Court authorize interim compensation at this juncture in the case pursuant to the provisions of Bankruptcy Code § 331.

13. The Law Firm respectfully makes the following representations with regard to the 12-factor Johnson test:

- (a) Time and Labor Required: The Law Firm has expended a total of 385.82 law firm hours through April 27, 2023, at the following rates:

<u>Attorney(s)</u>	<u>Hourly Rate</u>
Leon S. Jones	\$425.00-\$450.00
Leslie Pineyro	\$375.00-\$395.00
Tom McClendon	\$325.00
William D. Matthews	\$375.00
Katie Riley	\$250.00
Tessa Vuncannon (Paralegal)	\$200.00
Megan Cypher (Paralegal)	\$200.00
Daniela Manzo (Paralegal)	\$200.00
Blake Dernus (Paralegal)	\$150.00
Abby Arnold (Law Clerk)	\$175.00

- (b) Novelty and Difficulty of Questions Presented: The Chapter 11 reorganization case involves the effort to reorganize an individual business debtor. The Law Firm shows that the novelty and difficulty of questions presented are those normally associated with a Chapter 11 bankruptcy case but that Debtor's assets, transfers, and business holdings are large and intricate.
- (c) Skill Requisite to Perform Legal Services Properly: The Law Firm respectfully represents that it has the skill requisite to perform legal services heretofore rendered in a proper fashion.
- (d) The Preclusion of Other Employment Due to Acceptance of the Case: The Law Firm respectfully requests that the time expended by the Law Firm in connection with this case

could have been devoted to matters being handled for other clients, but for the time demands placed upon the Law Firm by the Law Firm's involvement in this case.

- (e) Customary Fee for the Type of Services Rendered: The Law Firm shows that all fees requested by the Law Firm were generated by applying the Law Firm's normal hourly billing rate to the number of hours actually expended. Such itemization is detailed on Exhibit A. The Law Firm respectfully represents that the customary compensation for the attorney services in connection with a bankruptcy case is upon an hourly billing basis.
- (f) Whether Fee is Fixed or Contingent: The Law Firm's charges are subject to being awarded by this Court under 11 U.S.C. § 330. The Fee is thus not truly fixed or contingent but has some characteristics of both.
- (g) Time Limitations Imposed by Client or Other Circumstances: The Law Firm shows that many of the services rendered have been performed under exacting time limitations imposed by the nature of the case.
- (h) Amount Involved and Results Obtained: The Law Firm is handling a large number of routine and complex Chapter 11 issues on behalf of the Committee. The Law Firm has been investigating Debtor's financial affairs and filed a joint plan of reorganization for the Debtor and the Estate. The Court entered an Order confirming the Debtor and Committee's joint plan on April 14, 2023 (Doc. No. 410). The Law Firm has represented the Committee since April 28, 2022.
- (i) Experience, Reputation, and Ability of Attorneys: The Law Firm respectfully represents that it has had a significant amount of experience within the areas involved in this representation.
- (j) Undesirability of the Case: The Law Firm respectfully represents that this factor is not normally applicable to a Chapter 11 case but that this case does include unusual challenges.

- (k) Nature and Length of Professional Relationship with the Client: The Law Firm shows that it has represented the Committee in this case since April 28, 2022.
- (l) Awards in Similar Cases: The Law Firm respectfully represents that its Application is in keeping with similar applications for Chapter 11 compensation filed by attorneys in bankruptcy cases within this district.

WHEREFORE, the Law Firm prays that it be allowed Chapter 11 compensation as follows:

- (1) \$125,642.50 representing fees;
- (2) \$8,422.91 representing actual out-of-pocket expenses incurred on behalf of the Committee of Unsecured Creditors; and
- (3) that the Debtor be authorized and directed to pay the Law Firm the \$134,065.41 requested award on a final basis and that any previous award be made final.

RESPECTFULLY SUBMITTED this 3rd day of May, 2023.

JONES & WALDEN LLC

/s/ Thomas T. McClendon

Thomas T. McClendon

Georgia Bar No. 431452

Attorneys for Committee of Unsecured Creditors

699 Piedmont Avenue, NE

Atlanta, Georgia 30308

404-564-9300

tmccclendon@joneswalden.com

EXHIBIT "A" FOLLOWS

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JONES & WALDEN, LLC
 Attorneys At Law

699 Piedmont Avenue, NE * Atlanta, GA 30308
 404-564-9300 • www.joneswalden.com

Teri Galardi Official Creditor Committee
 c/o A. Dudley & Mutepe Akemon
 699 Piedmont Avenue NE
 Atlanta, GA 30308

Page: 1
 May 2, 2023
 Account No: 2345.004
 Invoice No: 65002

Re: Creditor Committee

Fees

			Rate	Hours	
10/12/2022	DM	Edits on Motion, edits on first and final fee app for accountant and J&W, prepare to file, file, serve	200.00	4.10	820.00
	LSJ	Revise motion to grant committee standing for claims (.4); conf with TM re same and filing strategy (update on communication with debtor's counsel) (.2); prepare application for committee accountant fees (mmm) (.6); revise and finalize J&W's 2nd interim fee app (.4); conf staff re filing and service of today's pleadings (.1)	425.00	1.70	722.50
	TJV	Revise accountant fee app (.3); prep J&W fee app (.2)	200.00	0.50	100.00
	TTM	edits to motion to authorize (.4); filing same (.2).	325.00	0.60	195.00
10/13/2022	LSJ	Email exchange with committee re status/filings	425.00	0.10	42.50
	TTM	t/c Mutepe re: discovery documents, review prior depositions from same (1.4).	325.00	1.40	455.00
10/14/2022	TTM	email Chris re: sale (.1); conf DM re: Notice of Hearing, service (.2); review Certificate of service (.1).	325.00	0.40	130.00
	DM	Prep Certificate of service for Notice of Hearing and Motion, file certificate of service, serve certificate of service	200.00	4.60	920.00
10/18/2022	TTM	email from court; email to DM; review notice of hearing on derivative motion (.3); follow up review on NOH (.2).	325.00	0.50	162.50
	LSJ	Review and calendar entered order extending deadline for discharge and dischargeability objections	425.00	0.10	42.50
	LSJ	Review and calendar filed MMM (Committee accountant) fee app (.1); review and calendar filed J&W 2nd fee app (Committee counsel) (.1); review and calendar committee's filed motion to confer standing (.1); review docket and calendar Debtor's motion to sell Highland, Nevada (.1); review and calendar deadlines on entered order compelling Debtor to produce documents and withdrawal of committee motion to compel filing of MOR (.1); further review of filed Plan and disclosure and service of same (.1)	425.00	0.60	255.00
	DM	Edits on Notice of Hearing for Motion Avoidance; file (1.6) and serve (1.5)	200.00	3.10	620.00

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
10/19/2022	TTM	review motions to sell - Florida and Nevada (.8).	325.00	0.80	260.00
	DM	COA for Alexis King	200.00	0.20	40.00
10/21/2022	LSJ	Review Debtor sale motion (KOD) email exchange committee re: same (0.1)	425.00	0.10	42.50
	TTM	review motion to sell Frontage, email committee; email Lou/Chris (.7)	325.00	0.70	227.50
10/22/2022	LSJ	Review and calendar hearing on Debtor's motion to sell membership interest in JGP&P LLC and stock in Red-Eyed Inc (with proceeds to pay Trop secured claim and balance to estate IOLTA review contract) (.4); further review of debtor motion to sell Highland Ave, Las Vegas (.3)	425.00	0.70	297.50
	LSJ	Review status + multiple email exchanges with Committee and Debtor counsel (re plan, avoidance actions, and document production by debtor)	425.00	0.30	127.50
10/24/2022	TTM	review bank statements (1.8); review 2021 tax return; review documentation; lengthy email to Chris Terry re: outstanding needs (2.1).	325.00	3.90	1,267.50
10/25/2022	TTM	t/c Ainsworth re: sale motions (.3).	325.00	0.30	97.50
10/31/2022	TTM	t/c Lou re: objection to Nevada firms and propose potential solution; conf LSJ re: hearing; emails to Lou (hearing), Chris (2004 production) (.8); start outlining hearing prep for 11/16 hearing (.5).	325.00	1.30	422.50
	LSJ	Conference with Tom McClendon re: resolution and strategy re: hearing on Objections to Apps to Employ (Nevada law firms) (0.1); review report from committee accountant (0.1)	425.00	0.20	85.00
11/02/2022	MSC	Prepare COA for creditor and file	200.00	0.10	20.00
	TTM	t/c Lou re: fees; sales (.3); calendar fee applications (.1); t/c Lou (.2).	325.00	0.60	195.00
11/03/2022	LSJ	Review debtor limited objection re committee counsel fee application	425.00	0.10	42.50
11/06/2022	LSJ	Review IRS amended proof of claim asserting secured claim for estate tax and analysis re same	425.00	0.20	85.00
11/07/2022	LMP	review IRS Proof of Claim (.1) conf with LSJ re amendment to Disclosure statement and Plan (.3) prepare needs for amendment to plan and Disclosure statement (.2)	375.00	0.60	225.00
	LSJ	Email exchanges with Committee rep re status and meeting (.3); further analysis of IRS claim (.3); review debtor objection to fee app of committee (.1); conf with P re strategy post IRS amended claim (.4); committee meeting re IRS amended claim and amending plan (.9)	425.00	2.00	850.00
11/10/2022	LMP	conf with TM re disclosure statement revisions (.1) conf with TM re absolute priority rule, new value exception and additional confirmation objections/issues (.3)	375.00	0.40	150.00

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

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			Rate	Hours	
	TJV	Prepare order granting accountant interim fee app (.1); finalize and upload same (.1)	200.00	0.20	40.00
	TTM	conf DM re: binder of pleadings for 11/16 hearing, start reviewing pleadings filed for 11/16 hearing (1.6) conf LSJ, calls with Christina Lanier (IRS attorney), continue review (1.3); t/c Jim Silver (Power Financial attorney) re: objection to disclosure statement; start editing disclosure statement (.7); edits to disclosure statement, t/c Mutepe re: alcohol, adult entertainment license statements by debtor (1.8).	325.00	5.40	1,755.00
	LSJ	Prepare MMM fee order (Committee Accountant) (.1); conf with TM re Plan and disclosure statement (.5); telephone conference with IRS lawyer (.4); calls to Power attorney (.1); revise plan (.3); conf with TM re same (.1);	425.00	1.50	637.50
	LSJ	Review pleadings, conf with TM re strategy	425.00	0.20	85.00
	DM	prepare binders for TM and LJ	200.00	1.80	360.00
11/11/2022	TTM	editing plan and disclosure statement to address objections to disclosure statement (1.5); prep for 11/16 hearing (.7); t/c Lou re: potential to resolve objections (.3); t/c Ainsworth re: hearing and debtor's plan; continue prep for 11/16 hearing (.6); cont LSJ re: edits to plan, disclosure statement (.8); t/c Mutepe; run redlines; email committee on hearing, redlines (1.7).	325.00	5.60	1,820.00
	LSJ	Review and calendar McBryan's 2nd Interim Fee Application (.2); further review of IRS and Power Financial objections to Committee's disclosure statement (.1); review debtor's objection to committee disclosure statement (.1); review power financial protective objection to Debtor's sale motion (.1); review debtor's limited objection to committee counsel fee app (.1)	425.00	0.60	255.00
	LSJ	Conference with TM re negotiation with Debtor (strategy) (.2); revise plan to treat IRS newly filed secured claim (1.3); conf with TM re same and settlement/litigation strategy (.3); further revises on disclosure statement (.3); review and calendar debtor's motion to sell royal hammock property (Naples), review and calendar hearing on red-eye sale (re-notice) (.1)	425.00	2.20	935.00
11/14/2022	TTM	edit disclosure statement, plan; email Christina, Jim re: same; t/c Rob Matson re: serving as trustee (1.1); conf LSJ re: Galardi hearing (.4); edit status report (.6); t/c Rob Matson re: follow on serving as liquidating trustee (.3); t/c Jim Silver re: disclosure statement (.5); finalize status report (.5); continue preparation for 11/16 hearing (.2); same; prepare order granting Committee standing on avoidance actions (.9); filing/uploading status report and order granting standing (.3); t/c Ainsworth; email Committee re: updates (.3).	325.00	5.10	1,657.50
	LSJ	Prepare status report on motion to compel (.1); review Shulten Ward Turner fee app, calendar hearing (.1)	425.00	0.20	85.00
	LSJ	Email IRS attorney re plan revision, prep plan revisions (.1); email Power Financial attorney re plan revision, prep same (.2); conf with TM re hearing strategy (.4); email exchange with committee re same + settlement (.1)	425.00	0.80	340.00
11/15/2022	LMP	conf with TM re disclosure statement objections (.2)	375.00	0.20	75.00
	TTM	hearing prep (1.1); calls with IRS & Power Financial attorneys re:			

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
		disclosure statement objections; edits accordingly, draft notice of redlines; continue preparing for hearing (2.8); t/c Committee re: amended plan, disclosure statement; filing same (.7); save and email file-stamped copies to Court, Debtor's attorneys, IRS and Power Financial attorneys (.2); final prep for hearing (1.3).	325.00	6.10	1,982.50
	TJV	Compile/finalize amended disclosure statement, amended plan, and notice of filing redlines (.3); finalize and file same (.1)	200.00	0.40	80.00
	MSC	Prepare notebooks for hearing	200.00	0.20	40.00
	DM	Prepare binders for TM and LJ for hearing 11/16	200.00	0.50	100.00
	LSJ	Conference with TM re hearing prep (.2); email exchange with committee re hearing (.2); email exchanges with IRS re amended plan (.1)	425.00	0.50	212.50
11/16/2022	TTM	attend hearing on disclosure statement, motion to sell, motion to authorize Committee to bring actions, and others; travel to/from same.	325.00	8.10	2,632.50
	LSJ	Attend hearing on disclosure statement, motion to sell, motion to authorize Committee to bring actions; travel to/from same.	425.00	8.10	3,442.50
11/17/2022	TJV	Review Broward Co., FL real estate records per TM's request (.1); finalize and upload order granting 2nd interim J&W fee app (.1)	200.00	0.20	40.00
	TTM	review email from WM re: equitable marshalling; analysis re: same (.4); t/c WM; t/c Committee; t/c IRS attorney re: equitable marshalling before IRS lien expiration, research re: same (1.9); draft fee order (.1); t/c Matson (.2); review documents from Terry (.4);	325.00	3.00	975.00
	WDM	Research regarding IRS and marshaling and provide analysis to TTM regarding same (1.2); additional research regarding Tax Court cases and marshaling (0.9)	375.00	2.10	787.50
11/18/2022	TJV	Prepare subpoena to Miller estate and notice of intent to issue same (.3)	200.00	0.30	60.00
	TTM	reviewing discovery; debtor's disclosure statement (.8); review email from IRS attorney; t/c LSJ; t/c Edwards (1.0); reviewing draft subpoenas to Banks & Reidel (.2); t/c Chris, Lou re: mediation; t/c Committee re: same, discovery (.8); calls with Chris re: intra-district mediation request (.3).	325.00	3.10	1,007.50
	WDM	Research and review documents and memos regarding IRS claims and begin of draft complaint for marshalling against IRS (4.1); conference with TTM regarding resolution (0.2)	375.00	4.30	1,612.50
11/19/2022	LSJ	Prepare motion to extend 523 + 727 deadlines for creditor body	425.00	0.10	42.50
	LSJ	Review Boyer Terry Fee App, calendar deadlines and hearing (.1); review and calendar notices of re-set matters to 1-11-23, calendar Committee's Disclosure Statement, motion to authorize avoidance standing, motion to compel and objection to employment of Nevada counsel (.2); review Georgia Dept. of Revenue objection to debtor's plan (.1); review debtor mor & further review of debtor's plan and disclosure statement (.3)	425.00	0.80	340.00
11/20/2022	LSJ	Email exchanges (review) IRS attorney and TM	425.00	0.10	42.50

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
11/21/2022	TTM	conf LSJ re: mediation (.1); t/c Chris Terry re: mediation letter, 523/727 extension (.1).	325.00	0.20	65.00
	LSJ	Conference with TM re mediation and strategy	425.00	0.20	85.00
11/22/2022	TTM	draft motion and order extending deadline to object 523/727, email to Chris Terry; letter requesting mediation, email to Kyle George (.7); review renewed JGP&P sale motion, conf clerk re: same (.5); edit sale motion response (.4); finalize 523 motion and order; email TV re: upload (.2); t/c Chris Terry re: discovery production (.1).	325.00	1.90	617.50
	TJV	Finalize and file consent motion to extend 727 & 523 deadlines and upload consent order re same (.1); email to Universal Tracing re Galardi asset search (.1)	200.00	0.20	40.00
11/23/2022	AMA	Research on Fraudulent Intent under 11 U.S.C. 548.	175.00	0.80	140.00
	TTM	finalize notice of subpoena and email Committee re: response to JGP&P sale (.4); start comparing disclosure statements (1.9); work on putting together calculations of assets, liabilities for insolvency for mediation/settlement discussions (2.6).	325.00	4.90	1,592.50
	TJV	Finalize subpoena (Miller estate) and notice of intent to issue same, prepare correspondence to Riedel with acknowledgment of service (.4); finalize and file notice of intent (.1); finalize and issue correspondence to serve with subpoena (.2); finalize and file response to debtor's motion to sell stock interest (.1)	200.00	0.80	160.00
	LSJ	Review and prep 3rd party subpoena for debtor financials (.2); review entered order granting J&W fee app as committee counsel (.1); review filed notice of subpoena (Hardin Miller) (.1); review entered order granting committee's motion to extend deadlines (523 + 727) for creditors, calendar same (.1)	425.00	0.40	170.00
	LSJ	Review committee response to debtor's motion to sell redeye and frontage rd with protections for proceeds and creditors	425.00	0.20	85.00
11/26/2022	LSJ	Review docket (Notice of Hearing set committee objections), calendar same	425.00	0.10	42.50
11/28/2022	TTM	emails with Mutepe re: outstanding discovery needs, reviewing same (1.2); put together basic timeline of avoidable transfers and main events; list of outstanding questions (deposition or discussions with Chris) (.5); redline of JGP&G sale order (.6); review order on 2121 Las Vegas (.6); t/c Chris Terry re: discovery, hearing (.4); t/c Lou re: 2121 order, confirmation of mediation (.4).	325.00	2.60	845.00
	LSJ	Review and revisions on orders (sales), email exchanges re same	425.00	0.30	127.50
11/29/2022	LSJ	Conference with TM re IRS Plan treatment (plan fixes) (.2); email exchanges with TM and debtor re sale order (.1); email exchanges with committee and IRS re plan (.2); further email with debtor counsel re docs + mediation (.1)	425.00	0.60	255.00
	DM	Produce exavault link for Chris Edwards	200.00	0.60	120.00
	TTM	email on CPA fee order (.1); conf LSJ re: Galardi IRS liens (.2); email IRS; email Lou; review MOR (.6); t/c Chris Edwards re: budget; Mutepe re: insolvency claims (.4); conf DW re:			

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
		documents to Chris Edwards (.1); drafting statement on fraudulent transfers for mediation (.5); review orders on motions to sell; t/c Lou re: same (.5); email Lou re: his fees (.1); email Chris Edwards re: budget projections project; prep for IRS discussion on committee plan (1.0).	325.00	3.50	1,137.50
11/30/2022	LSJ	Conference with TM (hearing prep) (.1); conf with TM (debriefing re hearing on sales motions) (.2); email exchange and prep re committee accountant, review of financials (.1)	425.00	0.40	170.00
	TTM	drafting insolvency calculation (for mediation) (.8); t/c Lou re: fees (.1); attend hearing on motions to sell (.8); t/c Chris Terry re: mediation, deposition (.3); conf Mutepe re: FLSA classes of claims for insolvency chart; update same (1.6).	325.00	3.60	1,170.00
12/01/2022	LSJ	Prepare analysis re proposal to IRS re lien and plan treatment on specific assets	425.00	0.60	255.00
	TTM	prepare spreadsheet for IRS proposal, conf LSJ re: same (1.8); t/c IRS attorney re: outline of proposal (.4); email Tallulah re: clarification of proposal (.2); t/c Mupete re: sale withdrawal (.1).	325.00	2.50	812.50
12/02/2022	TTM	t/c Tallulah; email Committee on making IRS offer (.9); t/c Ainsworth re: checks; email Lou & Caproni re: same (.1); work on insolvency chart (1.7).	325.00	2.70	877.50
	LSJ	Conference with TM re IRS plan treatment	425.00	0.10	42.50
12/05/2022	TTM	t/c, emails with Committee re: IRS treatment (.3); draft spreadsheet listing proposed IRS secured properties; properties remaining for unsecured creditors (1.3); follow up conversation with Mutepe (.4).	325.00	2.00	650.00
12/06/2022	LSJ	Prepare correspondence to IRS re proposed plan treatment (.3); emails to IRS attorney re same (.1); email exchange re 2004 exam of debtor, calendar same (.1)	425.00	0.50	212.50
	TTM	calls with Ainsworth; Mutepe; Chris (.5); drafting Galardi settlement proposal to IRS (.6); email IRS attorney settlement proposal; email Lou; Committee re: mediation status (.3); start preparing for deposition (1.5).	325.00	2.90	942.50
12/07/2022	TTM	t/c Lou re: status of JGP&P closing (.2).	325.00	0.20	65.00
	TTM	prep deposition outline (2.2).	325.00	2.20	715.00
	LSJ	Review/ prep IRS claim	425.00	0.10	42.50
12/08/2022	TTM	email response to IRS attorney; (.2); start drafting second amended plan (IRS treatment) (.7); t/c Mutepe re: broker response; review list of property from broker to confirm no new properties (.7); t/c from Alan Pearlman re: offer on 506; email debtor's counsel re: same (.2).	325.00	1.80	585.00
12/09/2022	TTM	prep for deposition; t/c Chris Terry re: location of deposition; documents (4.4)	325.00	4.40	1,430.00
	AMA	Research regarding the allocation of liability for tax liens between a debtor and non-debtor who jointly filed taxes. Research regarding the requirements for an heir to gain legal			

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
		interest in property through probate.	175.00	1.30	227.50
12/12/2022	MSC	Prepare subpoena for deposition	200.00	0.20	40.00
	TTM	conf TV re: deposition prep (.1); t/c Chris re: Galardi deposition (.1).	325.00	0.20	65.00
	TJV	Review Butts Co. & Broward Co. real estate records per TM's request	200.00	0.30	60.00
12/13/2022	TTM	email Ms. Thomas re: hearing (.1); review email from Lou on closing delay; forward to Committee (.2); t/c Ainsworth re: closing issues; monthly checks (.3); call with Chris re: deposition; preparation for deposition; emails with Chris re: same (3.3).	325.00	3.90	1,267.50
	MSC	Prepare new subpoena and call ACR regarding the changes	200.00	0.10	20.00
	LSJ	Email exchange with chambers and counsel re rescheduling hearing, calendar same	425.00	0.10	42.50
12/14/2022	LMP	conf with TM re deposition pre (.2)	375.00	0.20	75.00
	MSC	Prepare deposition exhibits	200.00	4.70	940.00
	TTM	prepare for 2004 examination, putting together exhibits (1.9); continue preparation, discussions with Committee re: questions (1.4); same (2.4); finish preparation (1.6).	325.00	7.30	2,372.50
12/15/2022	TTM	take debtor's Rule 2004 examination; travel to/from Lou McBryan's office.	325.00	7.40	2,405.00
	LSJ	Debriefing with TM re 2004	425.00	0.10	42.50
12/16/2022	TTM	t/c Mutepe; email Chris Edwards re: budget projects under plan (.5); t/c from Anthony (Sarah Reidel's paralegal) (.1); review periodic reports, tax returns, documents re: cash flow, prepare rough outline of cash flow projections, projected plan payments for disposable income requirements (2.1).	325.00	2.70	877.50
12/19/2022	TTM	vm Sarah Reidel (.1).	325.00	0.10	32.50
	AMA	Research regarding requirements to transfer property out of a probate estate in Georgia, South Carolina, and Nevada.	175.00	5.10	892.50
12/20/2022	TTM	review research from law clerk re: passing of title in probate under NV, SC, and GA law; additional research; conf LSJ re: same (2.1); work on outlining projected budget; research on applicable period for 1129(a)(15) disposable income requirement (1.6); t/c Chris Terry re: meditation and items to address prior (1.1); conf LSJ re: same; projected budget (.2)	325.00	5.10	1,657.50
	LSJ	Conference with TM analyzing avoidance claims & other estate causes of action (including revocation of debtor's revocable trust) for purposes of mediation (1.0); conf with TM re settlement memo for mediation (.2)	425.00	1.20	510.00
12/21/2022	TTM	t/c Chris Edwards re: cash flow analysis (.4).	325.00	0.40	130.00
12/23/2022	LSJ	Email exchange with J. Diehl and opposing counsel re mediation (.1); review clerk's delinquency notice re debtor MOR + summaries (.1)	425.00	0.20	85.00

Teri Galardi Official Creditor Committee

Re: Creditor Committee

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05/02/2023

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
12/27/2022	TTM	drafting mediation statement (3.8); drafting second amended plan & disclosure statement per IRS agreement (1.4).	325.00	5.20	1,690.00
	LSJ	Conference with TM re strategy IRS acceptance of plan proposal (.1); email exchanges with IRS + committee re same; receipt and review of IRS correspondence re same (.2)	425.00	0.30	127.50
	WDM	Conference with TTM regarding mediation and absolute priority rule and going concern value (0.2); research regarding going concern value for exception to absolute priority rule and provide analysis to TTM regarding same (2.2)	375.00	2.40	900.00
12/28/2022	TTM	drafting mediation statement (6.4); t/c Ainsworth; email Lou re: KOD closing (.4).	325.00	6.80	2,210.00
	LSJ	Prepare plan mod for IRS treatment changes	425.00	0.20	85.00
	AMA	Researched South Carolina and Nevada law regarding a personal representatives powers after closing of a probate estate and requirements for assent to real property transfers by the personal representative of probate estates.	175.00	2.10	367.50
12/29/2022	LSJ	Email committee (mediation statement) and review of same (.1); email exchange with debtor counsel and mediator re mediation statements (.2)	425.00	0.30	127.50
	TTM	t/c Lou McBryan re: delayed closing (.2).	325.00	0.20	65.00
	TJV	Review Galardi CPA document portal and email docs to Mutepe per TM's request	200.00	0.20	40.00
12/30/2022	TTM	email Committee re: delayed closing (.1).	325.00	0.10	32.50
	LSJ	Review entered order authorizing mediation and appointing J. Diehl	425.00	0.10	42.50
	LSJ	Email exchange with committee re mediation statement	425.00	0.10	42.50
01/02/2023	TTM	email to Judge Diehl with mediation statement; email Chris & Lou re: budget analysis (.3).	325.00	0.30	97.50
01/03/2023	TJV	Prepare notice of filing redlines & finalize 2nd amended plan & disclosure statement (.3)	200.00	0.30	60.00
	TTM	conf LSJ re: mediation (.1); prep for conversation with Judge Diehl; emails with Committee (.9); t/c Ainsworth (.2); t/c Judge Diehl re: mediation (1.0); revising liquidation analysis re: IRS agreement (1.2); t/c Chris Terry re: IRS agreement to liquidating plan; mediation topics (1.0).	325.00	3.50	1,137.50
	LSJ	Conference with TM re mediation strategy (.1); email exchanges with IRS attorney re consent to plan terms (.2); email exchanges with mediator (.1); conf with TM re plan revisions per stipulation with IRS over plan treatment (.1); email exchanges with Committee (.1)	425.00	0.60	255.00
	LSJ	Email exchange IRS attorney re plan and pending hearing	450.00	0.10	45.00
01/04/2023	TJV	Finalize/compile 2nd amended disclosure statement & plan and notice of filing redlines (.3); finalize and file same (.2); email to MD and debtor's counsel with filestamped copies of same(.1)	200.00	0.60	120.00
	LSJ	Conference with TM; review mediation statement (.1); review mediation statement + revise liquidation analysis for committee plan with orderly liquidation values (.8); conf TM re same (.1)	425.00	1.00	425.00

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
	TTM	t/c Committee re: mediation (.5); t/c Mutepe re: procedural posture of mediation; discussions with clients (.2); conf LSJ re: second plan; finalizing second plan; disclosure statement (.8).	325.00	1.50	487.50
01/05/2023	TTM	t/c Chris Terry re: mediation (.8); outline properties at issue in preparation for call (.7); call with Committee; further conference LSJ re: mediation strategy (.8).	325.00	2.30	747.50
	LSJ	Review filed 2nd amended Committee Plan and accompanying disclosure statement and redlines (.2); conference call with TM re same (.8)	450.00	1.00	450.00
01/06/2023	TJV	Conduct people search (Kunstlinger), review results	200.00	0.10	20.00
	KLR	Research issue of contribution claims against joint filing spouses	250.00	3.30	825.00
	TTM	prepare for mediation; t/c Jonathan Loegel (GDOR) (1.5); send logistics emails to Judge Diehl, Chris, & Lou; test zoom capabilities (.5); continue preparations; conf WM; KR re: research needs (2.9); call with Chris Terry re: negotiations (2.1).	325.00	7.00	2,275.00
	WDM	Research regarding damages fro fraudulent transfer claims and stream of income from business that was fraudulently transferred and provide analysis to TTM regarding same for preparation for mediation	375.00	4.10	1,537.50
	LSJ	Conference with TM re negotiating strategy (mediation) (.1); conf with TM re damages claim on avoidance action (.1)	450.00	0.20	90.00
01/09/2023	LMP	conference with TM re mediation analysis (.1	395.00	0.10	39.50
	TTM	Prep for; attend mediation with Judge Diehl.	325.00	8.30	2,697.50
01/10/2023	TTM	t/c Ainsworth re: implementation of agreement (.2).	325.00	0.20	65.00
01/11/2023	LSJ	review docket notice re-scheduling numerous pending hearings, pending meditation note; calendar same	450.00	0.10	45.00
01/13/2023	TTM	start spreadsheet on unsecured creditors distributions for advocating acceptance of plan (1.4); t/c Mutepe re: next steps (.3)	325.00	1.70	552.50
01/16/2023	AMA	Drafted Notice of Withdrawal for Motion to Compel Discovery, and Objection to Special Counsel. Also drafted a fifth Motion to Extend Time to Discharge of Dischargeability.	175.00	1.42	248.50
	TTM	t/c Chris Terry re: drafting plan, disclosure statement; dates (.8); conf LSJ re: drafting disclosure statement (.4); start drafting amended disclosure statement (2.3).	325.00	3.50	1,137.50
	LSJ	Conference with TM re plan, settlement and liquidating trust (.6); further conf re same (.2)	450.00	0.80	360.00
01/17/2023	TJV	Finalize and file 523/727 extension motion and upload consent order re same	200.00	0.10	20.00
	TTM	editing disclosure statement (2.6); t/c Ainsworth re: timeline (.3).	325.00	2.90	942.50
	LSJ	prepare motion and order for 523 extension for creditor body	450.00	0.10	45.00
01/18/2023	TTM	editing the liquidating trust agreement, conf LSJ re: liquidating trust; disclosure statement (2.8); email Terry redline Disclosure statement and liquidating trust agreement (.1).	325.00	2.90	942.50

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
	LSJ	Conference with TM re plan provisions (.1); prepare liquidating trust (.1)	450.00	0.20	90.00
01/19/2023	LSJ	review and calendar entered order extending 523 deadline for all creditors	450.00	0.10	45.00
	LSJ	review status of IRS treatment and debtor's plan per mediation	450.00	0.10	45.00
01/21/2023	LSJ	Review Court docket and notices; calendar events and deadlines	450.00	0.10	45.00
01/23/2023	LSJ	Conference with TM re KOD transaction	450.00	0.20	90.00
	TTM	email Chris re: plan drafting (.1); email Sharon Whitlow re: secured claim (.1); t/c same (.2); t/c Lou re: KOD closing (.3); t/c Mutepe re: KOD closing, secured note (.5); conf LSJ re: same; t/c Lou (.4); t/c Ainsworth, email Lou re: agreement to secured note (.4).	325.00	2.00	650.00
01/24/2023	LMP	conf with TM re security and pledge for closing (.1)	395.00	0.10	39.50
	TTM	review secured note and DSD from Lou; conf LSJ, LMP re: pledge of membership form; email Lou with form and thoughts on note & DSD (1.3); t/c Lou re: closing (.4); t/c same re: security, urgency in closing; t/c Ainsworth re: Trop payoff (.5); t/c Lou (.1); review security agreement, pledges, and assignments, t/c Lou re: same (.5).	325.00	2.80	910.00
	LSJ	Conference with TM re securitization of interest in debtor's LLC membership interests under the plan	450.00	0.10	45.00
01/25/2023	LSJ	Review docket (clerk memo to C. Terry inquiry re filing of consensual disclosure statement and plan)	450.00	0.10	45.00
	TTM	review December MOR (.1).	325.00	0.10	32.50
01/26/2023	AMA	Researching whether trustee fees result from the disbursement of both Loans and Property as well as cash.	175.00	1.00	175.00
	TTM	t/c Tallulah re: timing of IRS claim; work on revising debtor's plan of reorganization (1.3); continue working on plan (2.2); t/c Chris; Ainsworth re: plan (1.3); continue on plan (.9); t/c Mutepe re: plan; claims, review claims per call (1.0).	325.00	6.70	2,177.50
01/27/2023	TTM	finish plan per mediation, review disclosure statement; t/c Chris re: outstanding items; email to Chris & Lou; conf LSJ re: review (4.5); t/c Ainsworth re: claims (.5); review form note and DSDs; conf TV re: same (.5); conf TV re: DSDs (.2).	325.00	5.70	1,852.50
	AMA	Research re transfers of loan funds and property from the Estate constitute disbursements subject to Trustee Fees (NO CHARGE)	0.00	1.40	0.00
	LSJ	Email exchange with debtor counsel; conf TM	450.00	0.10	45.00
	TJV	Prepare promissory note (per class 8 of plan) (.4); prepare three DSDs (DeKalb & Fulton properties) and verify legal descriptions (1.6)	200.00	2.00	400.00
01/31/2023	TTM	email Chris Terry re: plan (.1); conf LSJ re: liquidating trustee, email Chris Terry re: plan exhibits (.3).	325.00	0.40	130.00
	LSJ	Conference with TM re trust provisions and implementation	450.00	0.20	90.00

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
02/01/2023	TTM	meeting with Mutepe on claims review (3.2); t/c Ainsworth re: same (.4).	325.00	3.60	1,170.00
02/02/2023	LSJ	Review entered order on debtor's motion to sell Royal Hammock property (Naples Fla) (authorizing debtor to execute documents to facilitate the sale with estate received net proceeds of non-debtor entity sale of property) (.1); review debtor's amended Oct and November MOR (.1); Review debtor's amended MOR's for multiple months (.2); review IRS amended Proof of Claim (#35) asserting secured position (.1)	450.00	0.50	225.00
02/06/2023	LSJ	Review plan; conf with TM re collateralization	450.00	0.20	90.00
	TTM	t/c Chris; looking at liens; conf LSJ; t/c Chris (1.8).	325.00	1.80	585.00
02/07/2023	TTM	start review of exhibits from Chris (1.1); same (.4).	325.00	1.50	487.50
02/08/2023	LMP	plan prep conference with TM (.3)	395.00	0.30	118.50
	TJV	Finalize and file withdrawal of motion to compel discovery (.1); prepare and file withdrawal of objection to applications to employ NV counsel (.1)	200.00	0.20	40.00
	TTM	reviewing exhibits from Chris (.5); email committee on current sales (.2); reviewing disclosure statement; conf LMP, revise promissory note; hypothecation agreements; t/c Chris Terry; email Chris, Lou re: outstanding items under the plan (2.6); draft application for conditional approval, email to Chris (.4).	325.00	3.70	1,202.50
	LSJ	Review clerk memo to debtor counsel (re their delinquency on submission of chapter 11 plan (clerk's second request)); further review of docket and status of plan (.1); review withdrawal of our (Committee's Motion to compel discovery) (.1); prepare and review filing of committee's withdrawal of its objection to debtor's application to employ (.1)	450.00	0.30	135.00
02/09/2023	MSC	Prepare edits on creditor form letter	200.00	1.00	200.00
	TTM	review plan redline from Chris; drafting from of letter to creditors (2.7); finish drafting letter to creditors, email to Committee; LSJ (1.1).	325.00	3.80	1,235.00
	LSJ	Conference with TM and email exchanges	450.00		1.00
02/10/2023	LSJ	Review email exchanges (chambers and counsel) re scheduling	450.00	0.10	45.00
	TTM	email Chris re: filing plan (.2); t/c Chris Terry (.1); t/c Mutepe re: update (.1); emails re: same (.3); t/c Mutepe re: contacting creditors re: plan, addresses (.4); t/c Chris Terry re: update (.1).	325.00	1.20	390.00
02/11/2023	LSJ	Review December MOR	450.00	0.10	45.00
02/13/2023	TTM	t/c Mutepe re: conversations with creditors, resolving questions (.5); conf LSJ re: solicitation letter (.2); review redline of solicitation letter (.3)	325.00	1.00	325.00
	DM	Edits to Joint Plan Form Letter to Creditors	200.00	0.40	80.00
	LSJ	Prepare letter to creditor (re committee recommendation of the plan)	450.00	0.60	270.00
02/14/2023	TTM	t/c Chris re: listing agreements continuing on under liquidating			

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
		trustee; filing plan; email Committee re: Florida broker (.5); review app to employ broker for 4766 Frontage, review qualifications; email debtor's counsel why selected; email same re: Florida broker (.3).	325.00	0.80	260.00
02/15/2023	LMP	conf with TM re commercial real estate broker (.1)	395.00	0.10	39.50
	TTM	vm Julie Negovan (.1); t/c Chris re: plan, broker; email committee re: broker for Frontage (.5); t/c Paul Hanna (potential broker for Frontage (.4); t/c Chris Terry re: plan (.1).	325.00	1.10	357.50
02/16/2023	TJV	Begin prep of mail merge (unsecured creditors) for service of ballot pack and conference with TM	200.00	0.50	100.00
	TTM	t/c Mutepe re: creditor's questions (.4); vm Julie Negovan (.1); t/c same re: Naples house, 506 Office, vacant land in Naples; update spreadsheet; t/c Mutepe re: real estate (1.4); confirm plan, disclosure statement filed by Chris, conf staff re: serving; t/c Mutepe, Ainsworth re: servicing addresses; conf LSJ re: same; review solicitation letter (1.5).	325.00	3.40	1,105.00
	LSJ	Prepare committee letter to creditors recommending acceptance of plan	450.00	0.50	225.00
	DM	Edits on Form Letter to Committee	200.00	0.40	80.00
	DM	prepare ballot pack (printing)	200.00	0.50	100.00
	LSJ	Review application to conditionally approve disclosure statement and set confirmation (.1); review joint amended plan and disclosure statement (.2)	450.00	0.30	135.00
02/17/2023	TTM	conf LSJ; email Rhonda re: dates for confirmation (.2); revise broker application for Hanna; email same re: affidavit; application (.7); email Chris, Lou re: application; sign affidavit; email Hanna (.2).	325.00	1.10	357.50
	LSJ	Scheduling confirmation conf with TM	450.00	0.20	90.00
02/20/2023	TTM	review emergency filings from 506 buyer (.4).	325.00	0.40	130.00
02/21/2023	TTM	email with Ms. Thomas (.1); t/c Chris Terry re: status conference; draft Notice of Hearing, email Chris; file (.4).	325.00	0.50	162.50
	LSJ	Review AG South objection to plan (.2); review notice setting hearing on conditional approval of disclosure statement (.1); calendar hearing on same (and review of docket notice of same) (.1); review debtor's mor's (.1)	450.00	0.50	225.00
	LSJ	Conference with TM re status conference and scheduling on disclosure statement	450.00	0.20	90.00
02/22/2023	TTM	t/c Mutepe re: creditor thinking plan already served out (.2).	325.00	0.20	65.00
02/26/2023	LSJ	Review plan, trust agreement and collateralization docs for Galardi class 8 obligations	450.00	2.30	1,035.00
02/27/2023	TTM	t/c LSJ re: plan, disclosure statement (.3); attend status conference on disclosure statement (.3); t/c Chris (.1); review order setting disclosure statement, confirmation (.3); review file for outstanding items; email Lou, Chris re: Hanna broker application to be filed; calendar dates (.2).	325.00	1.20	390.00

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
	LSJ	Conference with TM further review of plan and disclosure (.7); attend hearing (status conference) to consolidated plan and disclosure hearing (including prep for same) (.5); email exchange with counsel re order and balloting (.1); email exchanges (calendar confirmation hearing) (.1)	450.00	1.40	630.00
	TJV	Prepare class 8 ballot form	200.00	0.20	40.00
02/28/2023	TTM	t/c Ainsworth re: claims withdrawn; creditors' addresses; update creditor distribution sheet to reflect withdrawn claims (.3); reviewing ballot pack mail merge list; update with new addresses; claims amounts for ballot; edits to form ballot; email to Chris (1.6); t/c Chris Terry re: ballot; 506 Office closing (.2) t/c Mutepe re: distribution question from creditor; fix error in attorney's fee calculation (.3); email Ainsworth & Mutepe re: remaining creditors addresses (.1).	325.00	2.50	812.50
	LSJ	Email exchanges (review re plan prep and analysis re mods needed)	450.00	0.20	90.00
03/01/2023	TJV	Prepare/update ballot pack mail merge addresses	200.00	0.50	100.00
	DM	prepare ballot service	200.00	0.10	20.00
	LSJ	Email exchanges (review) re AgSouth objection (resolution) and analysis of unsecured claims	450.00	0.20	90.00
	TTM	conf TV re: service (.3); review Ag South consent order; email comments re: same (.4); obtaining direct noticing addresses (.3); t/c from Amera Brewer re: process (.1).	325.00	1.10	357.50
	LSJ	Review entered solicitation order and calendar deadlines and hearing (.2); prepare service (.1); review withdrawal of numerous claims (.1)	450.00	0.40	180.00
03/02/2023	LMP	review letter to unsecured class (.2) conf with TM re same .1)	395.00	0.30	118.50
	TTM	confs re: outstanding addresses; finalizing solicitation letter, ballot (.5); t/c Mutepe re: Thompson claim; procedural questions from clients (.4); conf TV re: mail merge for letter; ballot for FLSA creditors (pre-filed with name, address & amount) (.7); conf LMP re: letter; serving out ballot packs (2.3).	325.00	3.90	1,267.50
	TJV	Prepare mail merges and service of ballot pack (with solicitation letter)	200.00	3.20	640.00
03/03/2023	TTM	review of creditors to be served; t/c Chris to eliminate overlap (.2); t/c Chris re: who serving who; conf TV re: same (.4); review Certificate of service; edits to same (.6); final review; conf TV to file (.2).	325.00	1.40	455.00
	LSJ	Prepare certificate of service and review service issues (solicitation)	450.00	0.20	90.00
03/06/2023	TTM	t/c Ainsworth re: clients executing ballots correctly (.2); follow up on broker with Chris (.1).	325.00	0.30	65.00
03/07/2023	TTM	full review of file for outstanding items prior to confirmation; conf LSJ re: 523/727 objection deadlines; put together list of outstanding items, email to Lou & Chris (1.2); t/c from Mary (clerk's office) re: Notice of Hearing on motion to authorize avoidance actions (.1); emails with Lou; Chris re: conference call			

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
		(.1); t/c from Mutepe re: King claim of secured claim (.3); edits to Notice of Hearing; email BD for filing; email Chris, Lou re: Notice of Hearing (.2).	325.00	1.90	617.50
	LSJ	Prepare Motion for 523/727 extension (.1); email exchanges with opposing counsel and review pending issues for resolution (.2)	450.00	0.30	135.00
	LSJ	Review service on Plan and compliance re balloting procedures (.1); review AG South Plan Objection, strategy with TM re resolution of same (.1); prepare re extension Motion of Creditor Comm Avoidance Actions and Standing and Notice of Hearing on same (.2)	450.00	0.40	180.00
03/08/2023	TTM	t/c from Keesha Weems re: case, completing ballot, what to expect (.2); t/c Mutepe re: ballot questions from clients (.3); edit Meleka Williams ballot; resend to her (.1).	325.00	0.60	195.00
03/09/2023	BD	Edit and File chapter 11 ballots	150.00	0.20	30.00
	LSJ	Conference with TM re pending issues (strategy) and balloting	450.00	0.30	135.00
	TTM	draft notice of filing ballots; email Mutepe re: Ward address (.2); draft notice of filing ballots for Brooks, Williams, Wright (.2); conf BD re: Williams ballot; email Ward her ballot (.2); t/c Ainsworth re: afternoon call (.2); draft ballot summary (.2); emails with Jim Silver (.3); call with Lou & Chris re: outstanding items (1.0);	325.00	2.30	747.50
03/10/2023	TTM	review 506 Office lawsuit complaint; conf LSJ re: 506 Office lawsuit; t/c Lou; email Committee re: call yesterday and update (.8); review motion to sell (.4); t/c Lou (.1).	325.00	1.30	422.50
	LSJ	Conference with TM re strategy on suit filed by buyer in Florida (research terms of automatic stay re same) (.3); review J Smith abstention order in Jack Jr case and email committee (.2); prepare and review committee report re pending items (pre-confirmation) (.1); review balloting (.1)	450.00	0.70	315.00
	LSJ	Review/ prepare re Motion for authorization on (LLC's execution for sale on Fort Lauderdale Property) and Motion to Expedite hearing, conf with TM re same (.2)	450.00	0.20	90.00
03/13/2023	LSJ	Review Debtor's motion to sell Fort Lauderdale property (.2); review email from debtor's counsel and order setting emergency hearing, calendar same (.2); review balloting, receipt and review of balloting (.1)	450.00	0.50	225.00
	TTM	reviewing ballots; updating spreadsheet, correcting names of clients (.4); same (.2).	325.00	0.60	195.00
	MSC	Prepare and file ballot for Minnis	200.00	0.30	60.00
	LSJ	Review Motion to Expedite Hearing on Motion re Sale of Fort Lauderdale Property (.1); review/ prepare re balloting (.1); review Georgia Dept. of Revenue objection re plan (.1); review transfer of claim agreement filed by Red Shield (purchased from Alexis King) (.1); review entered order granting expedite hearing, calendar hearing (Fort Lauderdale sale) (.1)	450.00	0.50	225.00
03/14/2023	TTM	review order; t/c Lou re: comments; email all with redline (.4); call with Lou, Linley, buyer re: order on 506 Office (.8); t/c Lou; email Linley re: affidavit (.3); conf BM re: attorney's lien issue; need for memo to file on same (.1); further review of redlined			

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
		order, t/c Lou re: COS (.4); attend hearing on motion to sell, follow up call with Lou, t/c Mutepe re: hearing outcome, purchase of claim by RedShield (1.1).	325.00	3.10	1,007.50
	LSJ	Review and calendar entered order setting hearing on sale motion (.1); review transfer of Alexis King claim to Red Shield, conf with TM re same (.1); review sale motion (.1); email exchange closing (Buyer) attorney re sale and closing requirements (.2); research rights to attorney fees (.2)	450.00	0.70	315.00
	LSJ	Review plan provisions and terms re debtor's authorization and requirements to fund plan from transactions by owned entities	450.00	0.20	90.00
	WDM	Conference with TTM and begin research on attorney's lien issue and whether attorney can lien his client's distribution or file secured claim (1.2); research and analysis to LSJ and TTM regarding whether fees awarded as contempt sanctions are enforceable by the firm awarded the fees or by the clients (1.7)	375.00	2.90	1,087.50
03/15/2023	MSC	Online real estate records search for property owner for TTM	200.00	0.10	20.00
	TJV	Prepare motion and proposed consent order extending dischargeability deadlines	200.00	0.20	40.00
	LSJ	Conference with TM re objection to Transfer to Claim	450.00	0.20	90.00
	WDM	Continued research and memo on attorney's lien issue and whether attorney has secured claim in bankruptcy case	375.00	0.40	150.00
	TTM	review order on Tract B; email Lou (.1); t/c Mutepe; email Michael De Campo (.3); review and email Lou, Chris re: outstanding items, review email re: extension of 523/727 (.6); t/c Ainsworth re: withdrawal of Trop claims; payment calculation issue (.3); t/c Ms. Long re: solicitations by Michael (.2); conf LSJ, research unauthorized practice of law (.6); start drafting objection to King transfer (.7 at no charge).	325.00	2.10	682.50
03/17/2023	TTM	conf LSJ re: Red Shield Funding email; conf TV re: people search (.5); t/c from Jamie Parker; conf TV re: ballot (.7); t/c Ainsworth; review procedure for objecting to claim based on preference (.6); t/c Mutepe re: Red Shield Funding (.2).	325.00	2.00	650.00
	LSJ	Conference with TM re strategy re illicit solicitation (.3); email exchange with Committee counsel and debtor counsel re realtor (.1); review listing agreement (Frontage Rd) (.1); review AG South Plan Mod and correspondence re same (.1)	450.00	0.60	270.00
	TJV	Conduct and review people search records re Campo per TM's request	200.00	0.50	100.00
	WDM	Additional research and finalize memo on attorney's lien issue for TTM	375.00	2.80	1,050.00
03/18/2023	LSJ	Review balloting	450.00	0.10	45.00
03/20/2023	BD	Update spreadsheets, scan and upload new ballots, and file ballots	150.00	0.40	60.00
	TTM	review notice of filing Callahan ballot (.1); conf BD re: email Chris copy of ballot delivered to J&W by post office (.1); email Red Shield Funding re: allegations regarding plan, t/c Lou; Chris re: claim, outstanding items (1.4).	325.00	1.60	520.00
03/21/2023	TTM	draft notice of ballot for Brandi Robertson; email for filing (.1);			

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
		review notice of ballot Africa Williams; email for filing (.1); email Jammie Parker blank ballot (.1); t/c from Mutepe re: ballots (.3); conf LSJ re: Michael De Campo transfer (.1).	325.00	0.70	227.50
	TJV	Email to creditor (Chatman) with ballot pack	200.00	0.10	20.00
	LSJ	Conference with TM re balloting and strategy re solicitation of claim transfer (.2); review balloting (.1)	450.00	0.30	135.00
	LSJ	Review entered order on motion re sale of Fort Lauderdale Property (authorizing debtor to execute LLC docs but denied of authority non-debtor to sell property) (.1); review notice of transfer of Alexis King Proof of Claim to Red Shield Funding (.1)	450.00	0.20	90.00
03/22/2023	TTM	review Hughes notice; email BD for filing (.1); follow up with Chris on Hanna application to employ (.1).	325.00	0.20	65.00
03/23/2023	LSJ	Review/ prepare application to employ Paul Hannah as realtor	450.00	0.10	45.00
03/27/2023	TTM	email Chris re: Adams note; email Paul Hanna re: motion to employ (.1); review memo from Bill on attorney's lien (.3); t/c from Ainsworth for update (.2); t/c Chris re: amendment to plan, liquidating trustee, payment of amounts (.6); review; request to file Hertzog ballot (.1).	325.00	1.30	422.50
	TJV	Finalize and file motion extending 523/727 deadlines & upload proposed order on same	200.00	0.10	20.00
	LSJ	Prepare and review motion and proposed consent order for 523 and 727 objections by unsecured creditors (.1); review balloting and filing (.1)	450.00	0.20	90.00
03/29/2023	TTM	review ballots; confs BD re: filing; review filing list (.3); t/c Astrid Gabbe & Chris Corsecheck (.9); reviewing plan; disclosure statement; list of remaining items for outstanding issues; t/c Chris Terry re: same, including roof on Frontage Road, amended plan (1.9)	325.00	3.10	1,007.50
03/30/2023	LSJ	Email exchange re AG South objection and consent order on same	450.00	0.10	45.00
03/31/2023	TTM	email Astrid re: ballots (.1); finish review of plan; disclosure statement, liquidating trust agreement (.8); email Mutepe re: amending Gregory claim (.1).	325.00	1.00	325.00
04/01/2023	LSJ	Review power financial's protective objection to the plan (.1); review balloting (.1)	450.00	0.20	90.00
04/02/2023	LSJ	Review attachment to Proof of Claim filed by claimant Brittany Gregory (.1); review entered order for further extension of time for unsecureds to file 523 and 727 actions (to 4-30-23) (.1); review balloting (Ag South class 2 ballot accepting plan) (.1)	450.00	0.30	135.00
04/03/2023	TTM	t/c Mutepe re: plan; creditor's questions re: confirmation; distribution (.8).	325.00	0.80	260.00
	LSJ	Review Red Shield filed Notice of Appearance filed Addendum to Proof of Claim (FLSA errata), and ballot and Red Shield plan objection	450.00	0.20	90.00

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
04/04/2023	TTM	t/c Chris, email Walter & Ainsworth; draft ballot report (1.3); drafting confirmation order (1.0).	325.00	2.30	747.50
	LSJ	Review entered order approving employment of Jones Lang LeSalle as broker	450.00	0.10	45.00
04/05/2023	TTM	draft confirmation order; confs LSJ re: same, needed edits to plan, liquidating trust agreement; draft same and email to Chris Terry (3.1); t/c Paul Hanna (.1); t/c Jammie Parker (.1); review plan redline (1.1); same, email Chris with comments (.5).	325.00	4.90	1,592.50
	TJV	Prepare withdrawals of Class 7 Proofs of Claim	200.00	0.80	160.00
	LSJ	Conference with TM re strategy (.1); prepare confirmation order (.1); review balloting and ballot report prep, review filed IRS ballot accepting the plan (.2)	450.00	0.40	180.00
04/06/2023	TTM	visit 4766 Frontage Road location, meet with Paul Hanna re: marketing property (1.3)	325.00	1.30	422.50
04/07/2023	TTM	review long email from Jim Silver; review deposits list from Chris (.3); t/c from Mutepe re: any remaining objections (.2); t/c Chris Terry re: objections (.4); t/c same (.1).	325.00	1.00	325.00
04/10/2023	LSJ	Conference with TM re plan confirmation (.1); hearing prep (.2); further hearing prep (.8)	450.00	1.10	495.00
	TTM	prepare for confirmation hearing (including reviewing 1129, including absolute priority rule and disposable income requirement, substantive consolidation, and waiver of discharge issues) (2.9); t/c Chris Terry (.2); response email to Wells Fargo (.1); break out anticipated distributions spreadsheet from total into two distributions (.6); conf LSJ re: potential confirmation hearing pitfalls (.3); emails on IRS ballots (.2).	325.00	4.00	1,300.00
	LSJ	Review ballot report (.1); review Boyer Terry status, report of plan deposits held (.1); review amended joint plan (to resolve pending objections) (.2); review Wells Fargo withdrawal of plan objection (.1)	450.00	0.50	225.00
04/11/2023	TTM	Prepare for and attend confirmation hearing; travel to/from (4.6); conf LSJ re: confirmation order; update confirmation order per hearing; email Chris Terry (.5).	325.00	5.10	1,657.50
	LSJ	Prepare for confirmation hearing, review plan objections and resolution (.7); travel to and from Macon, attend confirmation hearing (4.2); prepare confirmation order (.3)	450.00	5.20	2,340.00
	LSJ	Review debtor's declaration in support of plan (.1); review withdrawals of plan objections by Georgia Dept. of Revenue and Ag South (.1); review Court's docket entry re plan approval and calendar final disposition date (.1)	450.00	0.30	135.00
04/12/2023	TTM	email Mutepe re: hearing; draft and file notice of withdrawal; review Chris' edits to confirmation order, disclosure statement, email re: same; review plan and liquidating trust agreement to confirm changes had been made (1.1).	325.00	1.10	357.50
	LSJ	Conference with TM re action items (.2); further review of confirmation order (edits) and emails re same (.3)	450.00	0.50	225.00

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

			Rate	Hours	
	TJV	Finalize and file withdrawal of motion DN 210 (.1); review tax records re Frontage Rd & Royal Hammock properties and email to TM re same (.1)	200.00	0.20	40.00
04/13/2023	TJV	Finalize and upload confirmation order	200.00	0.10	20.00
04/14/2023	LSJ	Conference with TM re implementation of plan and strategy (.2); email exchange committee re same (.1)	450.00	0.30	135.00
	LSJ	Review entered order approving disclosure statement, review entered order confirming plan, calendar deadlines	450.00	0.30	135.00
04/17/2023	TTM	email Committee re: confirmation; email Paul Hanna re: confirmation, status of keys, cost-analysis (.2); email Chris Edwards re: confirmation, transition to liquidating trustee (.2); email Margaret re: J&W bill for fee application, start review of same (.5); continue review of bill (.3)	325.00	1.20	390.00
04/18/2023	TJV	Prepare 3rd & final fee app (counsel for committee)	200.00	0.20	40.00
04/21/2023	LSJ	Conference with TM re estate account	450.00	0.10	45.00
04/24/2023	TTM	review outstanding items for formation and execution of liquidating trust in preparation for call with Committee (.4).	325.00	0.40	130.00
04/25/2023	TTM	review outstanding items for formation and execution of liquidating trust in preparation for call with Committee (.8); call with Committee (1.2); call with insurance broker re: application for insurance to place on Frontage Road & Royal Hammock post-Effective Date (1.0)	325.00	3.00	975.00
04/26/2023	TTM	follow up email on insurance (.1); conf LSJ re: preparing Committee fee app (.1).	325.00	0.20	65.00
	LSJ	Conference with TM re effective date, fee app and pending resolution action items	450.00	0.20	90.00
04/27/2023	TTM	travel to SouthState Bank to open up liquidating trust account for Chris T. to wire money into; told needed legal review (.5).	325.00	0.50	162.50
		For Current Services Rendered		385.82	125,642.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Leon S. Jones	28.90	\$425.00	\$12,282.50
Leon S. Jones	27.00	450.00	12,151.00
Abby Arnold	1.40	0.00	0.00
Abby Arnold	11.72	175.00	2,051.00
Tessa Vuncannon	13.00	200.00	2,600.00
Leslie M. Pineyro	1.40	375.00	525.00
Leslie M. Pineyro	0.90	395.00	355.50
Megan Cypher	6.70	200.00	1,340.00
Tom T. McClendon	255.60	325.00	83,037.50
Katie L. Riley	3.30	250.00	825.00
Daniela Manzo	16.30	200.00	3,260.00
Blake Dernus	0.60	150.00	90.00

Teri Galardi Official Creditor Committee

05/02/2023

Re: Creditor Committee

Account No: 2345.004

Invoice No: 65002

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
William D. Matthews	19.00	375.00	7,125.00

Expenses

10/01/2022	Fee for Online Court Documents (PACER)	11.80
10/01/2022	Online legal research	116.00
10/03/2022	Postage (210 @ .57)	119.70
10/03/2022	Postage (4 @ 3.12)	12.48
10/03/2022	Postage (10 @ 7.82)	78.20
10/04/2022	Mileage to/from Banks & Reidel	106.25
10/10/2022	Federal Express	17.38
10/12/2022	Postage (164 @ .57)	93.48
10/12/2022	Postage	1.92
10/12/2022	Postage	1.68
10/13/2022	Federal Express	22.76
10/14/2022	Postage (171 @ 2.16)	369.36
10/14/2022	Photocopy charges - Motion	427.50
10/18/2022	Postage (171 @ .57)	97.47
10/18/2022	Photocopy charges - NOH	17.10
11/01/2022	Online legal research	238.25
11/01/2022	Fee for Online Court Documents (PACER)	63.20
11/02/2022	Postage	0.57
11/16/2022	Mileage to/from Macon for hearing	116.25
11/16/2022	Parking	4.00
11/23/2022	Federal Express	30.15
12/01/2022	Online legal research	398.25
12/01/2022	Fee for Online Court Documents (PACER)	0.10
12/07/2022	Federal Express	21.30
12/15/2022	Full Asset Search - Universal Tracing Services	350.00
12/30/2022	Photocopy charges - Depo Exhibits	100.00
01/01/2023	Online legal research	287.50
01/07/2023	Transcription fee - American Court Reporting Co., Inc.	1,895.00
02/01/2023	Online legal research	510.00
02/01/2023	Fee for Online Court Documents (PACER)	14.70
02/01/2023	Online real estate records search	1.50
02/16/2023	Photocopy charges - Plan and Disclosure statement	769.60
03/01/2023	Fee for Online Court Documents (PACER)	20.50
03/01/2023	Online legal research	227.50
03/01/2023	Photocopy charges - Plan, Disclosure statement, Order & Blot	879.30
03/03/2023	Postage (2 @ 15.60)	31.20
03/03/2023	Postage (4 @ 10.55)	42.20
03/03/2023	Postage (20 @ 9.80)	196.00
03/03/2023	Postage (25 @ 12.45)	311.25
03/03/2023	Postage (23 @ 11.45)	263.35
03/03/2023	Postage (4 @ 10.05)	40.20
04/01/2023	Fee for Online Court Documents (PACER)	1.30
04/11/2023	Mileage to/from Macon for hearing	112.66
04/11/2023	Parking	4.00
	Total Expenses	8,422.91
	Total Current Work	134,065.41

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-JPS

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing *Notice of Third & Final Application for Chapter 11 Compensation of the Attorneys Representing the Committee of Unsecured Creditors, Deadline to Object and for Hearing* ("Notice") and *Third & Final Application for Chapter 11 Compensation of the Attorneys Representing the Committee of Unsecured Creditors* ("Application") using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of and an accompanying link to the Notice and Application to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing Program:

- **Michael Akemon** mutepe.akemon@richardslegal.com
- **Ainsworth G Dudley** adudleylaw@gmail.com
- **Evan Owens Durkovic** ecfgamb@aldridgepите.com, edurkovic@ecf.courtdrive.com
- **Robert G. Fenimore** robert.g.fenimore@usdoj.gov, Ustp.region21.mc.ecf@usdoj.gov
- **Will Bussell Geer** wgeer@rlkglaw.com, notices@nextchapterbk.com; willgeer@ecf.courtdrive.com; 2836@notices.nextchapterbk.com; 6717577420@filings.docketbird.com
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- **Christopher W. Terry** chris@boyterterry.com, terrycr40028@notify.bestcase.com
- **U.S. Trustee - MAC** Ustp.region21.mc.ecf@usdoj.gov

I further certify that on this day I served a copy of the Notice *only* on the parties listed on the attached mailing matrix, and a copy of the Notice and Application on the following parties at the address shown below, via U.S. First Class Mail with adequate postage prepaid:

Teri G. Galardi
2146 Highway 42 South
Flovilla, GA 30216

This 3rd day of May, 2023.

JONES & WALDEN LLC

/s/ Thomas T. McClendon

Thomas T. McClendon, Georgia Bar No. 431452
Attorneys for Committee of Unsecured Creditors
699 Piedmont Avenue, NE, Atlanta, Georgia 30308
404-564-9300 | tmccclendon@joneswalden.com

Label Matrix for local noticing
113G-5
Case 22-50035-JPS
Middle District of Georgia
Macon
Tue May 2 09:27:12 EDT 2023

AgSouth Farm Credit, ACA
c/o Fortson, Bentley and Griffin, P.A.
2500 Daniell's Bridge Road
Building 200, Suite 3A
Athens, GA 30606-6178

American Express National Bank
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Attn: Kenneth Kleppinger
P.O. Box 3001
Malvern, PA 19355-0701

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Grace Gigi Galardi Trust
c/o Kelly Galardi, Trustee
2555 Chantilly Drive NE
Atlanta, GA 30324-3712

Insolvency

IRS

P.O. Box 7346

Philadelphia, PA 19101-7346

Internal Revenue Service

P.O. Box 7346

Philadelphia, PA 19101-7346

Document Page 32 of 35

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Jackson Galardi Trust
c/o Kelly Galardi, Trustee
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